

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

January 19, 1999

Office of Pesticide Programs (7508W)
U.S. Environmental Protection Agency
401 M Street SW.
Washington, DC 20460

Ms. Jacqueline McQueen

Subject: **Tebupirimfos (Phostebupirim): Initial response to document entitled “Risk Assessment Update for FQPA Requirements”**

BAYER appreciates the opportunity to comment on the subject document for Tebupirimfos. BAYER reserves the right to comment further on this document when it is formally released for public comment, however, after discussions with you and due to the nature of the comments, we felt it was important to submit some comments as soon as possible, so that the document could be corrected and an updated assessment can be performed in a timely manner. It should be noted that the primary comment here, concerning the existence of acute and subchronic neurotoxicity studies will affect the document released earlier this year by the Hazard Identification Assessment Review Committee entitled “Hazard Assessment of the Organophosphates”.

Both documents mentioned above make reference to the “fact” that in performing the risk assessment for Tebupirimfos, no acute or subchronic neurotoxicity studies were available. Furthermore, the HIARC document indicated that it was because of “this fact”, that an additional 3X safety factor should be applied to the risk assessment for the chemical. Shown below are references to studies which were submitted back in 1994 and 1995 for this chemical which satisfy this requirement. It is unclear why these studies have been missed in the assessment for this chemical, however, to expedite your efforts, additional copies of the studies have been included. The studies in question are:

<u>MRID #</u>	<u>Reference</u>
43473001	Sheets, L.P., (1994), “An Acute Oral Neurotoxicity Screening Study with Technical Grade Phostebupirim (MAT 7484) in Fischer 344 Rats”, BAYER Report Number 106804, 404 pages.
43656301	Sheets, L.P., (1994), “A Motor Activity Historical Control and Method Validation Study Using Triadimefon and Chlorpromazine in Fischer 344 Rats”, BAYER Report Number 106815, 53 pages.
43656302	Sheets, L.P., (1995), “An Subchronic Dietary Neurotoxicity Screening Study with Technical Grade MAT 7484 (Phostebupirim) in Fischer 344 Rats”, BAYER Report Number 106866, 470 pages.

In addition to the above mentioned studies, BAYER is uncertain about the status of one other study conducted for Tebupirimfos. Included with the above mentioned "Risk Assessment Update" was a December 8, 1997 document by P. Jennings entitled "Tier I Screen for Drinking Water Assessment for Phostebupirim". In this document, it was indicated that a review of an aerobic soil metabolism study had been completed for the following study:

44299803 Cink, J., J. Davis, and H. Lin, (1997), "Aerobic Soil Metabolism of (Pyrimidinyl-2-(carbon 14)) Tebupirimfos in Three Soils and at Three Concentrations", BAYER Report Number 107345, 141 pages.

In the review, it was indicated that additional data had been requested from BAYER to complete the review. It is unclear that BAYER ever received this review or request for more information and is hereby requesting a copy of the review cited in this document.

Thanks very much for your expedited handling of this request. If you need any additional information, please feel free to contact me or Dr. James Kunstman at (816) 242-2838.

BAYER CORPORATION
AGRICULTURE DIVISION

John S. Thornton
Director, Registrations

attachments